

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DR. MANHUA MANDY LIN,

Plaintiff,

v.

ROHM AND HAAS COMPANY,

Defendant.

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CIVIL ACTION NO. 02-CV-3612

DEFENDANT'S MOTION TO COMPEL

Pursuant to F.R.Civ.P. 37, defendant hereby moves for an Order compelling answers to defendant's interrogatories and document requests and compelling production of documents and for sanctions in the form of an award of the attorneys' fees incurred in filing this motion and in the form of a dismissal of plaintiff's compensatory damages claims for emotional distress and plaintiff's Count VIII claim for intentional infliction of emotional distress. Defendant incorporates herein the accompanying memorandum of law, and for any and all of the reasons presented therein, the Court should grant this motion and enter the proposed Order.

Respectfully submitted,


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